COPY Sent October 15, 2009

UNITED STATES ENVIRONMENTAL PROTECTION AGENC
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

October 14, 2009

REPLY TO THE ATTENTION OF:

Mr. Michael J. Erickson
Associate Vice President/Principal Engineer
ARCADIS
10559 Citation Drive, Suite 100
Brighton, MI 48116

SR-6J

RE: Kalamazoo River Off-Channel Areas Work Plan

Dear Mr. Erickson:

The United States Environmental Protection Agency (EPA) has completed its review of the October 7, 2009, off-channel Areas work plan for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site.

The work plan describes the sampling approach for a select group of off-channel areas between Crown Vantage and the Plainwell No. 2 Dam in the Kalamazoo River. The sampling approach incorporates agreements from prior collaborative discussions between EPA and the Michigan Department of Environmental Quality since April 27, 2009. Although EPA concurs with the sampling locations for the off-channel areas, EPA has two required revisions to the work plan.

- An additional objective of the work plan is to assess the nature of submerged low energy depositional environments. This work will then be used to build an understanding of the various submerged low energy depositional environments in this stretch of the river.

- The work plan indicates that "*Sediments will be probed with a steel rod at 3 to 5 evenly-spaced locations (including edge of water and mid-channel) across each transect. The probed locations will be surveyed... and the sediment composition described. Probing locations will be field-selected for sediment core sampling based on observations of sediment type, sediment thickness, and transect bathymetry/local morphology with a goal of obtaining approximately 75 percent of sediment samples from fine sediments and 25 percent from coarse samples in each off-channel area, unless only fine sediments are present.*" The work plan should eliminate the probing and replace with coring with lean tubes. Field processing of cores in the

field will be conducted to confirm the type of material in the deposits (fines [silt clay], vs. sands and organics). The correlation between elevated PCB concentration and fine sediments has been refined. Elevated PCB concentrations are better correlated to fines that include increased percentages of grey clay and not necessarily organic material. Cores collected for sample analyses will be processed using accepted techniques as identified in the work plan.

Therefore, EPA approves the Kalamazoo River off-channel Areas work plan pending receipt of a revised plan incorporating the above changes.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
SFD Remedial Response Branch #1

cc: Paul Bucholtz, MDEQ
Gary Griffith, Georgia-Pacific
Richard Gay, Weyerhaeuser

bcc:
Jeff Keiser, CH2MHILL
Leslie Kirby-Miles, ORC